



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6760

Refer to: Johns-Manville Asbestos Disposal Area, Waukegan, IL Site
Lake County/L0971900014
Superfund/Technical Reports

October 18, 1988

Mr. Brad Bradley
Remedial Project Manager
USEPA Region V
RERB HS-11
230 South Dearborn St.
Chicago, IL 60604

Dear Brad:

Revised Remedial Action documents including the amended work plan, QAPP (Attachment C), HSP (Attachment G) and construction plans and specifications (Revision/Attachment B, as superseded by Revision/Attachment B') were received in this office on October 11, 1988.

I have reviewed these documents with respect to Agency comments on the draft version submitted to us on April 11, 1988. Comments classified by you as "major" in your April 21, 1988 transmittal to Manville have been generally satisfactorily addressed. These remedial action documents are therefore approved by IEPA. However, I would like to note the following concerns which can be addressed during the course of the remedial action:

Work Plan (June 1988; Revised September, 1988 - Grey Document)

P.E-3 -- The construction detail (Figure E-2) for the above grade groundwater monitoring wells was not provided in the work plan submitted to IEPA. It is assumed that this figure is the same as in the draft document; with the background wells no longer being flush-mounted.

P.E-3 -- The details for mud rotary drilling work, if required, must be conveyed to the agencies in a timely manner and then thoroughly documented in the field.

P.F-5(C) -- No direct statement is made concerning the situation where the confirmed exceedence of groundwater surface water quality objectives is not attributable to the failure of the remedial action. It is assumed by this Agency that Manville will develop and implement supplemental remedial action work if necessary.

Health and Safety Plan (Attachment G, June, 1988; Revised September, 1988 - Grey Document)



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P.G-3 (Section 2.3.1) -- The HSP and the construction specifications (Section 01001, 9.6 and 9.7) should specifically cite the health and safety training requirements (29 CFR 1910.120(e)) and medical monitoring requirements (29 CFR 1910.120(f)) for hazardous waste site work. These regulations are generally outlined on the employee certification form at the end of the specifications document.

P.G-11 (Section 5.1) -- Showers must be available (as provided in the specifications) for workers and inspectors engaged in remedial activities.

QAPP (Attachment C, June 1988, Revised September, 1988 -- Grey Document)

Note: IEPA had deferred detailed comment on the QAPP to USEPA in the draft development stage; therefore, no comments are offered on the final version. The general draft comments on the QAPP and various sampling plans have been satisfactorily addressed.

Specifications (Attachment B, June, 1988, Revised October, 1988 -- Blue Document)

The most recent version of this document (Revision B') was reviewed.

P. 01001.2 (Article 2.3) -- "Material stockpiled on-site" should be defined. The construction plans allow for use of miscellaneous fill for grading in the northwest corner of the disposal area. It is assumed that this "material" reference applies to noncompactible debris around the site.

P.01001.4 (Article 4.3.3) -- The Agencies' representatives should be allowed to participate in progress meetings, or be briefed in detail separately by the owner.

P. 01001.13 (Article 29.4.1) -- It is routine for the owner or the contractor to provide office facilities for the Agencies' representatives (i.e. desk/chair, locking file cabinet and phone).

P. 01001.13 (Article 29.5.1) -- The Agency suggests that disposal of decontamination wastewater is more appropriately handled through the plant treatment system than by discharge to the asbestos disposal pit, and therefore to site groundwaters.

Remedial Construction Work Plans (Revision B')

The supplemental work outlined in these plans has been reviewed for consistency with the objectives of the ROD. Closure work on portions of the wastewater treatment system has been integrated with the original Remedial Action and is approved by IEPA.



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Other comments on the current plans are as follows:

- No schedule of quantities or Engineer's cost estimate for this construction work has been provided. It would be beneficial if that back-up information was provided to the agencies.
- Closure of the asbestos disposal pit calls for positive grading/cover and construction of a drainage swale to the southwest. It is unclear if erosion control measures (i.e. riprap and/or check dams) are included in the design. They appear to be necessary based on the 5-10% final grade present on a long run. These types of construction details can be easily modified in the field.

In general, I believe the construction plans and details have been presented clearly and concisely in these documents. I look forward, as we all do, to implementation of this Remedial Action by Manville. Please call me if you have any questions or comments on this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kurt D. Neibergall", written over a horizontal line.

Kurt D. Neibergall, Project Manager
Federal Sites Management Unit
Remedial Project Management Section
Division of Land Pollution Control

KDN:mls/3237j/10-12

cc: Terry Ayers, IEPA
Bill Hutton, IEPA
Howard Chinn, IOAG
Larry Johnson, USEPA
Division File